

CHRISTOPHER W. JAMES (Cal. Bar No. 289047)
cjames@velaw.com
Vinson & Elkins LLP
Two California Plaza
350 South Grand Avenue
Suite 2100
Los Angeles, California 90071
555 Mission Street
Suite 2000
San Francisco, California 94105
Telephone: 415.979.6949
Facsimile: 415.651.8786

EPHRAIM WERNICK (*pro hac vice pending*)
ewernick@velaw.com
PETER T. THOMAS (*pro hac vice pending*)
petethomas@velaw.com
Vinson & Elkins LLP
2200 Pennsylvania Ave. NW
Suite 500 West
Telephone: 202.639.6500
Facsimile: 202.639.6604

Attorneys for Claimants
Artyom Khachatryan, Guren Khachatryan, and WRH, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

REAL PROPERTY IN LOS ANGELES,
CALIFORNIA,

Defendant.

ARTYOM KHACHATRYAN, GURGEN
KHACHATRYAN, and WRH, INC.,

Claimants.

Case No. 2:22-cv-02902-JLS-PD

Assigned for all purposes to the
Honorable Josephine L. Staton

**VERIFIED CLAIM OF ARTYOM
KHACHATRYAN, GURGEN
KHACHATRYAN, AND WRH, INC.**

Pursuant to Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and
Maritime Claims, claimants Artyom Khachatryan, Guren Khachatryan, and WRH,
Inc. claim the full ownership interest in the Defendant real property in Los Angeles,

Case No.: 22-cv-02902-JLS-PD;
**VERIFIED CLAIM OF ARTYOM KHACHATRYAN, GURGEN
KHACHATRYAN, AND WRH, INC.**

1 California (the “Property”), demand the right to exercise full legal rights and
2 ownership over the same, and claim the right to defend this action. Claimants’ status
3 is that of owners of the Property.

- 4 1. On or about July 15, 2011, the trustees of the then-owner of the Property,
5 the Mapleton Trust, executed a Grant Deed conveying the Property to
6 Gurgen Khachatryan as trustee of the Veto Trust dated May 11, 2011
7 (the “Veto Trust”). *See* Exhibit A. The sole beneficiaries of the Veto
8 Trust were Artyom and Gurgen Khachatryan.
- 9 2. On or about May 13, 2016, the Veto Trust transferred title of the
10 Property to the WRH, LLC. *See* Exhibit B. WRH, LLC was an entity
11 whose business purpose was real estate investment. *See* Exhibit C-3.
12 Ted Khachatrian, a U.S.-based relative of Artyom and Gurgen
13 Khachatryan, served as, and is identified in public filings as, the
14 Manager of WRH, LLC. *See id.* The sole members of WRH, LLC were
15 Artyom and Gurgen Khachatryan. As acknowledged in the Complaint,
16 this transfer was executed pursuant to California Revenue & Taxation
17 Code Sec. 11925(d), which concerns transfers “that result[] solely in a
18 change in the method of holding title . . . and in which proportional
19 ownership interests . . . remain the same.” Compl. ¶ 52. Therefore,
20 Artyom and Gurgen Khachatryan maintained their continued ownership
21 interest in the Property through WRH, LLC.
- 22 3. On or about May 15, 2019, WRH, LLC converted into a California
23 Corporation, WRH, Inc. *See* Exhibit D-1. The Chief Executive Officer,
24 Secretary, and Chief Financial Officer of WRH, Inc. is Ted Khachatrian.
25 *See* Exhibits D-2, D-3. The sole directors of WRH, Inc., as transparently
26 indicated in public documents filed with the Secretary of State for the
27 State of California, are Artyom and Gurgen Khachatryan. *See* Exhibits
28

1 D-2, D-3. Artyom and Guren Khachatryan are and at all times have
2 been the sole shareholders of WRH, Inc.

3 I declare under penalty of perjury under the laws of the United States that the
4 foregoing is true and correct.

5
6 DATED: June 13, 2022



Artyom Khachatryan

7
8
9 DATED: June 13, 2022



Guren Khachatryan

10
11 Attorney Christopher James is duly authorized to make this Claim.

12
13 DATED: June 16, 2022

VINSON & ELKINS LLP

/s/ Christopher James

Christopher James

Attorney for Claimants

*Artyom Khachatryan, Guren Khachatryan,
and WRH, Inc.*

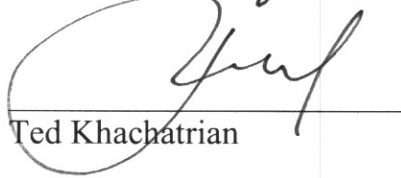
VERIFICATION

I, Ted Khachatryan, am the Chief Executive Officer, Secretary, and Chief Financial Officer of WRH, Inc. and am authorized to make this verification on its behalf.

I have read the foregoing Verified Claim of Artyom Khachatryan, Guren Khachatryan, and WRH, Inc., and know the contents thereof. I am informed and believe that the matters stated are true, and on that basis I declare that the matters stated are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 11 day of June 2022, at Los Angeles.


Ted Khachatryan

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of June, 2022, a copy of the foregoing was served via the Court's ECF system upon all counsel of record.

/s/ Christopher James
Christopher James